

**IN THE SUPREME COURT OF FLORIDA
BEFORE THE FLORIDA JUDICIAL QUALIFICATIONS COMMISSION**

INQUIRY CONCERNING A JUDGE
LAURA MARIE WATSON, NO. 12-613

CASE NO. SC13-1333

**SUPPLEMENT TO NOTICE OF DISCOVERY OF
ADDITIONAL MATERIALS SUBJECT TO SUBPOENA**

Comes now The Florida Bar, through undersigned counsel, who files this Supplement to the Notice of Discovery of Additional Materials Subject to Subpoena, and states:

1. The undersigned counsel filed on behalf of The Florida Bar on February 17, 2015 a Notice of Discovery of Additional Materials Subject to Subpoena.
2. Undersigned counsel represented that there may exist additional materials responsive to a subpoena of November 12, 2013 that inadvertently may not have been disclosed, and that counsel would diligently pursue the identification and provision of additional materials to counsel for the Respondent if those materials existed.
3. The Florida Bar retained national e-discovery counsel, Ms. Jill Griset of McGuire Woods, to provide a comprehensive analysis of the issue. Ms. Griset is experienced in the management of electronic discovery and production.

RECEIVED, 04/10/2015 08:08:59 PM, Clerk, Supreme Court

4. The results of the comprehensive analysis have been completed and are reflected in communication to counsel for the Respondent this date, which details in a light most favorable to the Respondent any materials not previously provided. This letter is attached as Exhibit A.

5. For purposes of comparison, counsel has provided, as reflected in Exhibit B to this supplemental notice, an inventory of materials which were provided to counsel for the Respondent in 2013 and 2014.

Respectfully submitted,

BEDELL, DITTMAR, DeVAULT, PILLANS & COXE
Professional Association

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Attorneys for The Florida Bar

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 10, 2015, a true and correct copy of the foregoing was furnished by electronic mail to:

Michael L. Schneider
Judicial Qualifications Commission
1110 Thomasville Road
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Mschneider@floridajqc.com

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The Honorable Laura M. Watson
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Honorable Kerry I. Evander
Fifth District Court of Appeal
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Honorable Peter M. Weinstein
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/s/Henry M. Coxe, III
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EXHIBIT A

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April 10, 2015

VIA FED-EX

Mr. Robert A. Sweetapple
Law Offices of Sweetapple, Broeker & Varkas, P.L.
20 S.E. 3rd Street
Boca Raton, FL 33432

Re: Case No.: SC13-1333; Judge Laura M. Watson

Dear Mr. Sweetapple,

I write to follow up on Jill Griset's letter of February 25, 2015 ("February 25 Letter") regarding the Florida Bar's (the "Bar's") response to the Subpoena Duces Tecum issued to Ghenete Wright Muir dated November 12, 2013 ("the Subpoena").

We have completed the collection and review outlined in detail in the Subpoena section of the February 25 Letter. On the enclosed disc and via Managed File Transfer, we are producing unique nonprivileged documents found in that collection that are responsive to the Subpoena or, even if not responsive to the Subpoena, if they merely mention "Watson" and based on our searches appeared to be "true hits" for the term (i.e., that were not documents mentioning a person other than Laura Watson with the same name.)¹

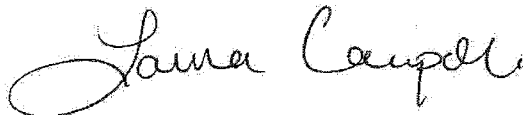
We also included "families" of produced documents in the production if they were not privileged. So, for example, if a document was attached to a document that mentioned "Watson," and it was not privileged, we produced it regardless whether the individual attachments are separately responsive to the Subpoena.

¹ The Subpoena was issued in November 2013 and the Bar completed its initial production on January 9, 2014. For purposes of our review, we evaluated all documents falling within our collection and dated on or before January 17, 2014. We are still evaluating documents that post-date January 17, 2014. Although those documents would not have been originally produced, as they post-dated the Bar's response to the Subpoena and many of them are privileged, if we find additional documents from that set that are not privileged and responsive to the Subpoena, we will produce them. We are also still performing quality control procedures on a small number of documents dated on or before January 17, 2014 and if we find additional documents that are not privileged and responsive to the Subpoena, we will produce them.

Robert A. Sweetapple
Law Offices of Sweetapple, Broeker & Varkas, P.L.
April 10, 2015
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As Ms. Grisette made clear in the February 25 letter, we are willing and ready to discuss any questions or concerns you may have regarding the scope of our collection and review. As of this date, we have not received any communication from you regarding the searches we proposed to you in our February 25 letter.

Sincerely,

A handwritten signature in cursive script, reading "Laura Y. Campoli". The signature is written in dark ink and is positioned above the printed name.

Laura Y. Campoli

LYC:ebm
Enclosure

cc: Henry Coxe (via e-mail)
Jill Grisette (via e-mail)
Melissa Nelson (via e-mail)
Rutledge R. Liles (via e-mail)
Adria Quintela (via e-mail)

EXHIBIT B

RECORDS PRODUCED BY THE FLORIDA BAR

Tab	Date	Description
1	10/12/05	Third Amended Complaint, <i>Stewart Tilghman Fox & Bianchi, P.A. v. Marks & Fleischer, P.A.</i> , Case No. 50-2004-CA-006138, Circuit Court, Fifteenth Judicial Circuit, Palm Beach County, Florida
2	04/24/08	Final Judgment, <i>Stewart Tilghman Fox & Bianchi, P.A. v. Kane & Kane</i> , Case No. 50-2004-CA-006138, Circuit Court, Fifteenth Judicial Circuit, Palm Beach County, Florida
3	04/30/08	Initial Complaint (received 05/09/08)
4	06/26/08	Letter from The Florida Bar (Alan Pascal) to Laura Watson
5	07/01/08	Letter from Peter Goldman to The Florida Bar (Alan Pascal)
6	09/04/08	Letter from Larry Stewart and William Hearon to The Florida Bar (Alan Pascal) re: reply to responses of Respondents
7	11/12/08	Letter from Larry Stewart to The Florida Bar (Alan Pascal) re: trial court's denial of post-trial motions
8	11/12/08	Letter from Larry Stewart to The Florida Bar (Alan Pascal)
9	11/14/08	Letter from Peter Goldman to The Florida Bar (Alan Pascal) re: supplement to initial response (without enclosures)
10	11/14/08	Letter from Peter Goldman to The Florida Bar (Alan Pascal) re: supplement to initial response (with enclosures)
11	11/24/08	Letter from Larry Stewart to The Florida Bar (Alan Pascal)
12	04/13/09	Letter from The Florida Bar (Alan Pascal) to William Hearon
13	10/01/10	Letter from Larry Stewart to The Florida Bar (Alan Pascal)
14	01/11/11	Consolidated Answer Brief of Appellees and Initial Brief (Cross-Appeal)
15	08/30/11	Consolidated Cross-Reply Brief of Appellees/Cross-Appellants
16	02/29/12	Fourth DCA Opinion
17	05/11/12	Letter from William Hearon to The Florida Bar (Ghenete Muir)
18	05/16/12	Letter from Larry Stewart to The Florida Bar (Ghenete Muir)

Tab	Date	Description
19	05/18/12	Letter from William Hearon to The Florida Bar (Ghenete Muir)
20	05/25/12	Notice of Grievance Committee Review
21	06/06/12	Certified Mail Receipt for mail from The Florida Bar to Peter Goldman
22	06/07/12	E-mail from Ghenete Muir to Adam Rabinowitz re: extension
23	06/07/12	E-mails between Ghenete Muir and Adam Rabinowitz
24	06/07/12	E-mail from Adam Rabinowitz to Ghenete Muir attaching Peter Goldman's 08/11/08 correspondence
25	06/07/12-07/16/12	E-mail string between Adam Rabinowitz, Peter Goldman, and Ghenete Muir
26	06/08/12	Letter from Larry Stewart to The Florida Bar (Ghenete Muir)
27	07/16/12	Laura Watson's Response to Complaint
28	08/10/12	Letter from Larry Stewart and William Hearon to Grievance Committee
29	08/10/12	E-mail from William Hearon to Ghenete Muir attaching documents (1 of 6)
30	08/10/12	E-mail from William Hearon to Ghenete Muir attaching documents (2 of 6)
31	08/10/12	E-mail from William Hearon to Ghenete Muir attaching documents (3 of 6)
32	08/10/12	E-mail from William Hearon to Ghenete Muir attaching documents (4 of 6)
33	08/10/12	E-mail from William Hearon to Ghenete Muir attaching documents (5 of 6)
34	08/10/12	E-mail from William Hearon to Ghenete Muir attaching documents (6 of 6)
35	10/02/12	Amended Notice of Grievance Committee Review
36	10/12/12	Second Amended Notice of Grievance Committee Review (without exhibits)

Tab	Date	Description
37	10/12/12	Second Amended Notice of Grievance Committee Review (with exhibits)
38	10/22/12	Notice of Finding of Probable Cause for Further Disciplinary Proceedings
39	10/22/12	Letter from Ghenete Muir to Peter Goldman re: notice of finding of probable cause
40	10/22/12	Letter from Ghenete Muir to William Hearon and Larry Stewart re: notice of finding of probable cause
41	11/19/12	Letter from Ghenete Muir to Peter Goldman re: new Designated Reviewer
42	11/20/12	Letter from Larry Stewart and William Hearon to The Florida Bar (John Berry)
43	11/28/12	Letter from Larry Stewart and William Hearon to Michael Schneider (Florida Judicial Qualifications Commission) enclosing complaint against Laura Watson
44	12/26/12	Letter from The Florida Bar (Kenneth Marvin) to the Florida Judicial Qualifications Commission
45	01/30/13	Letter from The Florida Bar (Michele Wright) to Julio Gonzalez, Jr. re: public records request
46	09/16/13	Judge Laura M. Watson's Motion to Dismiss for Lack of Subject Matter Jurisdiction
47	09/20/13	Judicial Qualifications Commission's Response to Judge Laura M. Watson's Motion to Dismiss for Lack of Subject Matter Jurisdiction
48	09/30/13	Memorandum of Law in Response to the JQC's Response to Judge Watson's Motion to Dismiss for Lack of Subject Matter Jurisdiction
49	10/03/13	JQC's Order on Pending Motions
50	11/12/13	Subpoena for and Notice of Taking of Videotaped Deposition Duces Tecum of Non-Party Ghenete Wright Muir
51	11/14/13	Letter from Robert Sweetapple to Miles McGrane, III

RECORDS PRODUCED BY THE FLORIDA BAR

	DATE	To	From	Document	Description
1	11-2-12	GWM	L. Stewart	e-mail	Believe all 6 attys should be disbarred. Willing to help in any way possible.
2	11-7-12	GWM	L. Stewart	e-mail	What happens now that L. Watson has won her judgeship?
3	6-13-13	L. Stewart	K. Marvin	e-mail	Showing that an order of the court is sufficient for TFB's burden of proof of the rule violations.
4	6-17-13	L. Stewart	K. Marvin	e-mail	Sent a copy of the referee manual.
5	7-10-13	AEQ	L. Stewart	e-mail	Sets forth what he believes should be our trial strategy, arguments, etc.
6	7-18-13	L. Stewart	AAP	e-mail	Acknowledging receipt of the 7-10-13 e-mail.
7	12-26-12	Judicial Qualifications Commission	Ken Marvin	Letter	Cover letter enclosing the public records portion of TFB file on Watson.
8	1-30-13	Julio Gonzalez	MicheleWright	Letter	Letter regarding costs for public records request and returning a costs check for a public records request. Requesting a new check with the correct amount.
9	8-19-13	Adria Quintela	Ken Marvin	e-mail	Service Notice of court filing by L. Watson in JQC case by Michael Schneider
10	10-7-13	Adria	Lisa Adamson,	e-mail	e-mail forwarding

		Quintela; Ghenete Wright Muir; Alan Pascal; Emily Sanchez; Miles McGrane	assistant to Miles McGrane		Response to Watson's Motion to Dismiss filed in JQC case.
11	10-7-13	Adria Quintela; Ghenete Wright Muir; Alan Pascal; Emily Sanchez; Miles McGrane	Lisa Adamson, assistant to Miles McGrane	e-mail	e-mail forwarding Watson's Motion to Dismiss in JQC case.
12	10-7-13	Adria Quintela; Ghenete Wright Muir; Alan Pascal; Emily Sanchez; Miles McGrane	Lisa Adamson, assistant to Miles McGrane	e-mail	e-mail forwarding Order on Pending Motions in JQC case.
13	10-7-13	Adria Quintela; Ghenete Wright Muir; Alan Pascal; Emily Sanchez; Miles McGrane	Lisa Adamson, assistant to Miles McGrane	e-mail	e-mail forwarding Memo of Law in response to JQC's response to L. Watson's Motion to dismiss
14	10-25-13	R. Sweetapple	D. Bianchi	e-mail	e-mail inquiring about Watson's interest in deposing Bianchi